



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

November 1, 2013

Salmon-Challis National Forest
Attn: Karen Gallogly
1206 South Challis Street
Salmon, Idaho 93467

Re: U.S. Environmental Protection Agency comments for the Salmon-Challis National Forest Travel Planning and OHV Designation Project to Comply with District of Idaho Court Order Draft Supplemental Environmental Impact Statement. EPA Project Number 07-034-AFS.

Dear Ms. Gallogly:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our section 309 authority, our review of the DSEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We are rating the DSEIS Environmental Concerns – Insufficient Information (EC-2) because we are concerned that the Motor Vehicle Use Maps do not communicate important travel management restrictions, and because the DSEIS does not sufficiently disclose the total amount of Forest-wide motor vehicle routes designated for public use.

Project Summary

The DSEIS provides supplemental analysis to revise and correct deficiencies in the original 2009 FEIS identified by the District Court of Idaho in the February 4, 2011, Decision Order. The Forest Supervisor will review the 2009 FEIS and DSEIS to determine: what changes to roads, trails, and areas and types and seasons on motor vehicle use designated in the 2009 Record of Decision are warranted based on supplemental analysis of impacts of motor vehicle routes on wilderness values; what changes are warranted based on the process to apply "minimization criteria" to comply with the 2005 Travel Management Rule; which roads, trails and areas closed by court order should remain closed because of irreparable harm or potential for irreparable harm; and, which routes and areas closed by court order to reopen because extensive road and trail work remedied harm.

Communicating Motorized Vehicle Use Rules and Expectations

We strongly support the SCNF's efforts to implement the 2005 Travel Management Rule. Eliminating cross country travel, communicating open routes through Motor Vehicle Use Maps, closing redundant routes, and closing or repairing routes causing unacceptable impacts to forest resources is already and will continue to result in significant environmental benefits.

Motor Vehicle Use Maps are centrally important because they facilitate compliance by communicating travel decisions. Because MVUMs are the law when it comes to legal motorized use on forests - similar

to how "The label is the law" for pesticide regulations - it is important that they be easily obtained, familiar, uniform, understandable, and complete. We are concerned that the SCNF's MVUMs are not complete. Specifically, we are concerned that the MVUMs do not communicate several important elements of the SCNF's travel management plan, including: unacceptable damage limitations on dispersed camping; 30 foot set-back from streams, lakes or ponds for motorized access to dispersed camping; and the prohibition on motorized travel off designated routes for game retrieval.

Recommendation

To increase the likelihood that forest users clearly understand that motorized travel to dispersed camping cannot cause unacceptable resource damage, is not allowed within 30 feet of water-bodies or for game retrieval, we recommend that this information be added to the MVUM or integrated into supplementary navigation materials as appropriate. We recognize that the SCNF has been implementing the 2009 travel plan for several years and look forward to learning from your experience through your response to this comment.

Disclosing Total Amount of Forest-wide Motorized Routes Designated for Public Use

The 2005 Travel Management Rule and this project's FEIS and DSEIS acknowledge that increased motorized use and a proliferation of routes is causing adverse impacts to roadless and wilderness values, water quality, fish and wildlife and their habitat, cultural resources, and increasing the spread of noxious weeds. The Travel Management Rule also acknowledges that funding for maintenance and administration of routes and motorized use is limited. One important summary indicator of a forest's progress toward reducing adverse impacts to sensitive forest resources, and implementing travel management which is sustainable over the long-term, is the total amount of Forest-wide motorized routes designated for public use. Because we believe this indicator is helpful for decision makers, the public and stakeholder groups, we are concerned that the DSEIS does not clearly disclose the total amount of Forest-wide motorized routes which would be designated.

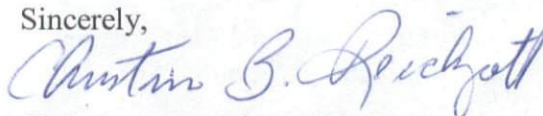
Recommendation

We recommend that the Final SEIS include additional information on the total amount of Forest-wide motorized routes that would be designated for public use. Please include in the FSEIS:

- The 2009 FEIS Alternative 5's total motorized routes: system + unauthorized,
- The 2009 ROD Selected Alternative's total proposal for motorized routes to be designated on the MVUM,
- The total motorized routes designated for public use on the SCNF's 2012 MVUMs, and
- The 2013 SEIS Alternative's total proposed motorized routes for designation on the MVUM.

Thank you for your time on the phone with staff and for this opportunity to comment. If you have any questions, please contact me at (206) 553-1601, or by electronic mail at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382, or by electronic mail at peterson.erik@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.